

IN THE UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF OHIO
EASTERN DIVISION

THE DEPARTMENT OF THE TREASURY
OF THE STATE OF NEW JERSEY AND ITS
DIVISION OF INVESTMENT, on behalf of
itself and all others similarly situated,

Plaintiff,

v.

CLIFFS NATURAL RESOURCES INC.,
JOSEPH CARRABBA, LAURIE BRLAS,
TERRY PARADIE, and DAVID B. BLAKE,

Defendants.

Civ. A. No. 14-CV-1031-DAP

Judge Dan Aaron Polster

Magistrate Judge Greg White

**DEFENDANTS' MOTION FOR LEAVE
TO FILE DOCUMENTS UNDER SEAL**

Defendants Cliffs Natural Resources Inc. (“Cliffs”), Joseph Carrabba, Laurie Brlas, Terrance M. Paradie, and David B. Blake (collectively, the “Defendants”) move the Court, pursuant to Local Rule 5.2, to file under seal the following exhibits that accompany Defendants’ Motion Under Rule 12(f) to Strike Certain Allegations from the Second Amended Complaint (“Motion to Strike”), which is being filed concurrently with this Motion:

1. Declarations of CW 7, Exhibits A, B, and C to the Motion to Strike;
2. Declarations of CW 18, Exhibits D and E to the Motion to Strike.
3. Declaration of CW 2, Exhibit F to the Motion to Strike.
4. Declaration of CW 29, Exhibit G to the Motion to Strike.

Good cause exists for this motion. Each of the aforementioned declarations contains the identity of individuals on whom Plaintiff relied as a “Confidential Witness” in its Second

Amended Complaint (“SAC”). Defendants seek to preserve the confidential nature of these former employees of Cliffs by not publicly revealing their names and connection to particular allegations, and therefore request that the Court permit them to file the individuals’ unredacted declarations under seal. Defendants will file redacted versions of the declarations with the motion to strike and will await the Court’s Order on this motion to file the unredacted versions.

Local Rule 5.2 provides that no document will be accepted for filing under seal unless a statute, court rule, or prior court order authorizes the filing of sealed documents. A similar motion for filing under seal was presented and granted in connection with a similar motion to strike allegations from the first amended complaint. Accordingly, Defendants request that this motion be granted and that the Court issue an order permitting the aforementioned documents and future documents related to this motion containing the individuals’ names to be filed under seal.

Dated: May 15, 2015

/s/ John M. Newman, Jr.

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*Attorneys for Defendants Cliffs Natural
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CERTIFICATE OF SERVICE

I hereby certify that the foregoing Defendants' Motion for Leave to File Documents Under Seal has been filed electronically this 15th day of May, 2015. Notice of this filing will be sent by operation of the Court's electronic filing system to all parties indicated on the electronic record. Parties may access this filing through the Court's electronic system.

/s/ John M. Newman, Jr.

*One of the Attorneys for Defendants Cliffs
Natural Resources Inc., Joseph Carrabba,
Laurie Brlas, Terry Paradie, and David B.
Blake*